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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

NML CAPITAL LTD.,

Plaintiff,

v.

THE REPUBLIC OF ARGENTINA,

Defendant.

CASE NO.: 2:14-cv-00492-RFB-VCF

**STIPULATION AND ORDER FOR
EXTENSION OF TIME FOR NML
CAPITAL, LTD. TO FILE RESPONSES TO
NON-PARTY WITNESSES PATRICIA
AMUNATEGUI AND M.F. CORPORATE
SERVICES (NEVADA) LIMITED'S
OBJECTION TO MAGISTRATE JUDGE'S
ORDER (DKT. #107) AND TO NON-
PARTY VAL DE LOIRE'S OBJECTION
TO MAGISTRATE JUDGE'S ORDER
PURSUANT TO FED. R. CIV. P. 72 (DKT.
#111)**

(FIRST REQUEST)

Plaintiff NML Capital, Ltd. ("NML"), by and through its attorneys of record, Kirk B. Lenhard, Esq., and Nikki L. Baker, Esq., of Brownstein Hyatt Farber Schreck, LLP, and Dennis H. Hranitzky, Esq., of Dechert LLP, non-parties M.F. Corporate Services (Nevada) Limited ("MF Nevada") and Patricia Amunategui, by and through their attorney of record, Kent P. Woods, Esq., of Woods Erickson & Whitaker LLP, and non-party Val de Loire, LLC ("VDL"), by and through its attorney of record, Jason M. Wiley, Esq., of Kolesar & Leatham (NML, MF Nevada, Ms.

Amunategui, and VDL are collectively referred to as the "Parties"), hereby agree and stipulate, subject to the Court's approval, as follows:

1. On March 16, 2015, Magistrate Judge Ferenbach issued an order granting in part and denying in part MF Nevada's Motion to Quash (Dkt. #14), granting in part and denying in part NML's Counter Motion to Compel (Dkt. #60), denying Non-Party Val de Loire's ("VDL") Motion to Quash (Dkt. #1), and granting NML's Counter Motion to Compel (Dkt. #10) (the "Order"). (Dkt. #101.) Pursuant to Local Rule IB 3-1(a), any objection to the Order was due on or by March 30, 2015;

2. On March 30, 2015, non-party Mossack Fonseca & Co. ("Mossack Fonseca") filed a Motion to Intervene (Dkt. #106), MF Nevada and Ms. Amunategui filed an Objection to Magistrate's Order Pursuant to Fed. R. Civ. P. 72 (Dkt. #107) ("MF Objection") and a Motion to Clarify the Court's Order (Dkt. #108), and VDL filed an Objection to Magistrate Judge's Order Pursuant to Fed. R. Civ. P. 72 (Dkt. #111) ("VDL Objection").¹ Pursuant to LR IB 3-1(a) and LR 7-2(b), NML's responses to the four pending motions/objections are due on Thursday, April 16, 2015. (*See* Dkts. #106-109.);

3. Due to NML having *three*² response briefs due on the same day, to the lead associate on this matter preparing for trial, to local counsel being out of the office for a week, and to lead counsel presently being out of the country, NML requires additional time to adequately respond to the MF Objection and the VDL Objection;

4. Mr. Woods, on behalf of MF Nevada and Ms. Amunategui, and Mr. Wiley, on behalf of VDL, have agreed to extend the deadline for NML to file its responses to the MF Objection and to the VDL Objection for eight (8) days, or up to and including April 24, 2015. In return, NML has agreed to provide MF Nevada, Ms. Amunategui, and VDL with a corresponding

¹ On April 1, 2015, the docketing clerk struck the VDL Objection due to counsel selecting the wrong event when filing. (*See* Dkts. #109 and #110.) Counsel for VDL was instructed to re-file the VDL Objection under the appropriate event and to link the newly filed document to the Order (Dkt. #101). (*See id.*) VDL re-filed the VDL Objection on April 1, 2015. (Dkt. #111.)

² On April 13, 2015, NML filed a Notice of Non-Opposition to Mossack Fonseca's Motion to Intervene (Dkt. #106). (Dkt. #113.) As such, NML has three remaining motions/objections it must respond to. (*See generally*, Docket.)

extension of time to file their respective replies in support of the MF Objection and the VDL Objection; and

5. In light of the foregoing, the Parties submit that good cause exists for the Court to approve this stipulation, and respectfully request that the Court extend the deadline for NML to respond to the MF Objection and the VDL Objection eight (8) days, or up to and including April 24, 2015, and extend the deadline for MF Nevada, Ms. Amunategui and VDL to file their respective reply briefs for eight (8) days.

DATED this 15th day of April, 2015.

KOLESAR & LEATHAM

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IT IS SO ORDERED.

DATED this 21st of April, 2015.



RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

Respectfully submitted by:

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